

**THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Catherine A. Kwiatkowski aka Cathy A. Kwiatkowski	:	
	:	
Debtor	:	CHAPTER 7
	:	
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FREEDOM MORTGAGE CORPORATION:	:	
Movant	:	
	:	
v.	:	NO. 5:17-03370 JJT
	:	
Catherine A. Kwiatkowski aka Cathy A. Kwiatkowski	:	
Debtor	:	11 U.S.C Section 362
	:	
and	:	
Robert P. Sheils, Jr., Esq.	:	
	:	
Trustee	:	

**ANSWER TO MOTION OF FREEDOM MORTGAGE COORPORATION
FOR RELIEF FROM AUTOMATIC STAY
UNDER SECTION 362**

NOW COMES Trustee, Robert P. Sheils, Jr., Esquire, by and through his attorneys, Sheils Law Associates, P.C., and answers the Motion of Freedom Mortgage Corporation for Automatic Stay, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph four and strict proof thereof is demanded.
5. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph five and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will

have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors currently scheduled for September 29, 2017.

6. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph six and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors.

7. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph seven and strict proof thereof is demanded.

8. Admitted.

9. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph nine and strict proof thereof is demanded.

10. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph ten and strict proof thereof is demanded.

11. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph eleven and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors.

12. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph twelve and strict proof thereof is demanded.

WHEREFORE, Robert P. Sheils, Jr., Esquire, Chapter 7 Trustee, respectfully requests this Honorable Court deny Movant's Motion for Relief until after the 341 meeting of creditors currently scheduled for September 29, 2017.

Dated: September 15, 2017

/s/ Jill M. Spott
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